

1 Ryan Gile, Esq.
2 Nevada Bar No. 8807
3 *rgile@weidemiller.com*
4 F. Christopher Austin, Esq.
5 Nevada Bar No. 6559
6 *caustin@weidemiller.com*
WEIDE & MILLER, LTD.
7251 W. Lake Mead Blvd., Suite 530
Las Vegas, NV 89128-8373
Tel: (702) 382-4804
Fax: (702) 382-4805

Attorneys for Plaintiff The Hackett Miller Company, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 THE HACKETT MILLER COMPANY, INC., a
Nevada corporation,

12 || Plaintiff,

13 || v.

14 GFOUR PRODUCTIONS, LLC, a Florida limited
15 liability company; and SPOTLIGHT RIGHTS,
LLC, a Florida limited liability company,

16 Defendants.

Case No.: 2:16-cv-00418-RFB-NJK

**STIPULATION AND (PROPOSED)
ORDER FOR EXTENSION OF TIME
FOR PARTIES TO FILE A
DISCOVERY PLAN AND
SCHEDULING ORDER PURSUANT
TO THE COURT'S ORDER DATED
MARCH 31, 2017 (Seventh Request)**

18 Plaintiff THE HACKETT MILLER COMPANY, INC. (“Plaintiff”), and Defendants
19 GFOUR PRODUCTIONS, LLC and SPOTLIGHT RIGHTS LLC (“Defendants”), by and
20 through their undersigned counsel, hereby stipulate and agree to a seventh extension of time of 7
21 days up to and including June 30, 2017, for the parties to file a Joint Discovery Plan and
22 Scheduling Order with the Court pursuant to the Court’s Minute Order dated March 31, 2017
23 (ECF No. 29).

24 On March 30, 2017, the Court denied without prejudice Defendant's Motion to Dismiss
25 for (1) Lack of Personal Jurisdiction, (2) Failure to Join a Necessary Party, and (3) Improper
26 Venue, and (4) Request to Transfer Venue (ECF No. 22) and ordered the parties to engage in
27 jurisdictional discovery for a period of 60 days commencing March 31, 2017, and to submit a
28 joint proposed discovery/scheduling order within one week from March 31, 2017.

1 To date, the parties have filed six extensions of time to file a discovery plan (ECF Nos.
2 30, 32, 34, 36, 37, and 38) and one extension of the jurisdictional discovery (ECF No. 34) – all of
3 which have been granted by this Court (ECF Nos. 31, 33, 35, 39, 40, and 41). The good cause for
4 all of the extensions was that the parties were engaging in substantive settlement discussions.

5 In the most recent stipulation (ECF No. 38), the parties notified the Court that on June 14,
6 2017, the parties agreed upon and finalized all terms of the written settlement agreement that the
7 parties had been negotiating, but that the parties needed additional time to sign the circulated
8 execution version of the settlement agreement and then prepare and file a dismissal of this case
9 with the Court.

10 On June 14, 2017, Plaintiff's counsel sent the execution version of the settlement
11 agreement to Plaintiff for signature. Unfortunately, due to numerous business and personal family
12 commitments along with a scheduled vacation by the Plaintiff's primary principal, whom
13 Plaintiff's counsel has been working with in connection with this settlement agreement and who
14 would be the individual signing the settlement agreement on behalf of Plaintiff, Plaintiff's counsel
15 has not yet received a signed settlement agreement from Plaintiff. Plaintiff's counsel currently
16 expects to receive a signed settlement agreement from Plaintiff sometime around Wednesday,
17 June 28, 2017.

18 By this Stipulation, the parties request that the deadline to file a joint proposed discovery
19 plan/scheduling order be extended by 7 days to June 30, 2017. This is the seventh request for an
20 extension of time by both parties to file the joint proposed discovery/scheduling order.

21 Good cause exists for this request because while the parties have agreed upon and
22 memorialized in writing all terms and conditions of a settlement agreement to resolve this
23 litigation, the parties still require additional time to obtain signatures from the parties. For these
24 reasons, this stipulated request is made for good cause and not for purposes of delay.

25 ///

26 ///

27 ///

28 ///

1 The parties note that jurisdictional discovery in this matter is set to close on June 30, 2017
2 (ECF No. 35) and hereby stipulate and agree that Plaintiff shall not seek any extension of the
3 jurisdictional discovery period.

4

5 Dated: June 23, 2017

6 Respectfully Submitted,

7

/s/ Ryan Gile

Ryan Gile (NV Bar No. 8807)
rgile@weidemiller.com
F. Christopher Austin (NV Bar No. 6559)
caustin@weidemiller.com
WEIDE & MILLER, LTD.
7251 W. Lake Mead Blvd., Suite 530
Las Vegas, NV 89128
Tel: 702-382-4804
Fax: 702-382-4805

12

*Attorneys for Plaintiff, The Hackett
Miller Company, Inc.*

13

Dated: June 23, 2017

Respectfully Submitted,

/s/ Jonathan Winter

Gene S. Winter (pro hac vice)
gwinter @ssjr.com
Jonathan A. Winter (pro hac vice)
**ST. ONGE STEWARD JOHNSTON AND
REENS LLC**
986 Bedford Street
Stamford, CT 06905-5619
Tel: 203-324-6155

Ronald D. Green (NV Bar No. 7360)
Alex J. Shepard (NV Bar No. 13582)
RANDAZZA LEGAL GROUP, PLLC
4035 S. El Capitan Way
Las Vegas, NV 89147
Tel: 702-420-2001
ecf@randazza.com

*Attorneys for Defendants, GFour Productions,
LLC and Spotlight Rights, LLC*

14

15

16

IT IS SO ORDERED.

17

18

19

20

21

22

23

24

25

26

27

28



RICHARD F. BOULWARE, II
United States District Judge

DATED this 29th day of August, 2017.